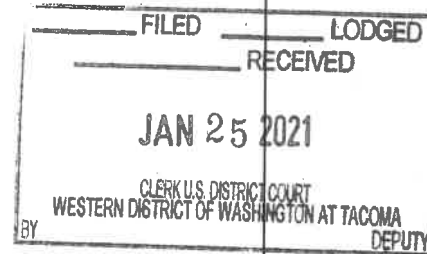


Pro Se 1 2016



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JANET CHLENTZOS-WILLIAMS

CASE NO. 3:21-cv-05069-RAJ
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

Plaintiff(s),

v.

Square Inc.
BEA BROW

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Janet Chlentzos-Williams</u>
Street Address	<u>4901 FAIRWOOD BLVD NE APT 168</u>
City and County	<u>TACOMA, Pierce</u>
State and Zip Code	<u>WASHINGTON 98422</u>
Telephone Number	<u>206-795-9026 CEN</u>

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1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
 3 defendant is an individual, a government agency, an organization, or a corporation. For an
 4 individual defendant, include the person's job or title (if known). Attach additional pages if
 5 needed.

6 Defendant No. 1

7 Name

8 Job or Title (if known)

9 Street Address

10 City and County

11 State and Zip Code

12 Telephone Number

Square, Inc.
 1455 MARKET ST. Suite 600
 WEBSITE: www.squareup.com
 SAN FRANCISCO
 CALIFORNIA 94103
 1-415-375-3176 / 1-855-700-6000

13 Defendant No. 2

14 Name

15 Job or Title (if known)

16 Street Address

17 City and County

18 State and Zip Code

19 Telephone Number

Bea Grow
 Sequim Clallam
 Washington

20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

2-MAILINGS (ENCLOSED) FROM SQUARE INC
 Addressed to Janet Chentzos-Williams
 Joseph Turner (Actually 2 mailed)
 6-EMAILS from SQUARE (I Returned 1)
 ENCLOSED

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual.

The plaintiff (name) Janet Chentzos Williams, is a citizen of the
 State of (name) Washington.

b. If the plaintiff is a corporation.

The plaintiff, (name) _____, is incorporated under
 the laws of the State of (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its principal
 place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual.

The defendant, (name) Beatrice Grow, is a citizen of the
 State of (name) Washington. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation.

The defendant, (name) Square Inc, is incorporated under
 the laws of the State of (name) California, and has its principal
 place of business in the State of (name) California.

Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

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3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

This ^{MAILING} CAUSED me emotional distress when I received the mailing and was ^(UNAWARE) bleeding internally at the time and ^{not feeling well} in MAY 2017 ended up needing blood transfusions and in critical condition. I ~~CAUSED~~ ^{IT WAS CAUSED BY A NEW PRESCRIPTION}

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

~~SQUARE INC~~ MAILED 2 Addressed to me and Joseph Turner I returned 1 in March 2017 & kept other one my ~~ESTRANGED~~ ^{BECAUSE} BROTHER & HER FRIEND Sheryl CURTIS made a Sarcastic comment on Facebook when I posted photo of the ^{disturbing (Like they knew)} IV. RELIEF MAILING on Facebook

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I HAVE EXPERIENCED MAIL FRAUD - BOX BREAKING / TAMPERING IN 2012 at my former apt residence. I went to ^{IN} ~~BURIE~~ ^{BURIE} District Court and was turned away from the clerks OFFICE. NOT ONLY MAIL FRAUD identity - but OTHER CIVIL rights violations. I continue to receive mail NOT ADDRESSSED WITH BOTH MY LAST NAMES. NO COURT SHOULD TURN YOU AWAY WITH EVIDENCE \$100,000 V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

Pro Se 1 2016

purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

1-14-2021

Signature of Plaintiff

Janet Chentzos-Williams

Printed Name of Plaintiff

Janet Chentzos-Williams

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

From: Square moreply@legal.squareup.com
Subject: We've Updated our Additional POS Terms
Date: Jun 19, 2019 at 11:46:00 AM
To: Jnt251@cs.com



Hi,

As you may have heard, we acquired the website-building company Weebly last year. To reflect the new eCommerce features coming to Square sellers as a result of this acquisition, we've updated our Additional Point of Sale Terms, which will be effective as of July 10, 2019.

Here's what's new:

Additional POS Terms: We've updated the Online Store Terms to include additional terms that will govern your use of the Square Online Store and other exciting new eCommerce features that you can unlock through your Square Online Dashboard. These terms specify what you can and cannot do when selling and posting online, and provide additional information regarding your use of Square Online Store and other eCommerce features.

What you should do:

We encourage you to review the updated Terms in full, which will apply to you if you continue to use our products and services on and after July 10, 2019.

Thank you for being a part of the Square community.

The Square Team

~~3~~

From: Square notifications@messaging.squareup.com
Subject: New login from Opera on Windows
Date: Jun 28, 2018 at 7:33:57 AM
To: Jnt251@cs.com



New login from Opera on Windows

Hello,

Your email address **jnt251@cs.com** was just used to log into Square from a new browser and/or device.



New login from Opera on Windows

jnt251@cs.com

Thursday, June 28, 2018 at 4:33 PM (CEST)

Marbella, Malaga, Spain*

If you don't recognize this activity, we recommend changing your password as soon as possible. Otherwise, you can disregard this message.

[UPDATE PASSWORD](#)

Alternatively, you can visit <https://squareup.com/password> to reset your password.

Why are we sending this? We didn't recognize the browser or device you used to log into your Square account. This could be the result of accessing your account from a new or public computer or changing your browser settings, but

it could also be a sign of unauthorized account activity.

Manage Account Need help? [Let us know.](#)

Thanks,
The Square Team

Square Secure is here to help protect you so you can focus on running your business. [Click here to find out more.](#)

**This location is an approximation based on your IP address and its accuracy depends on your Internet Service Provider.*



© 2018 SQUARE, INC.
1455 MARKET STREET, SUITE 600, SAN FRANCISCO, CA 94103

From: Square noreply@help.messaging.squareup.com
Subject: Please Create a New Case with Square Support
Date: Mar 28, 2017 at 9:55:42 PM
To: jnt251@cs.com

Hi ,

Thanks for your reply! It's been more than 2 weeks since we last heard from you, so we closed this case.

If you have additional questions, please create a new case with our Support Team by visiting the Support Center.

Additionally, feel free to visit Square's Seller Community to get ideas and help from other Square sellers.

Thanks again,

Square Support

For your reference this is Case #: 19650226

Please keep in mind that Square will be able to use and share any idea you submit without any obligations or restrictions.
For more details, please visit [Square Legal Agreements, Notices, Licenses, and Policies](#).

3-18-17

I know

this was not

your Janet

for placing
in my mailbox

since my

name was on it.

Att: Mark

Att: ~~Gregory~~ Rebecca

~~no~~ Joseph
Turner
lives with me



Square

POSTNET
STANDARD
U.S. POSTAGE
PAID
BURLINGAME, CA
PERMIT NO. 1

44

Joseph Turner
Janet Chrentzos-Williams
4901 Fairwood Blvd Ne Apt 168
Tacoma, WA 98422-2135



Get yours at www.squareup.com



VISA



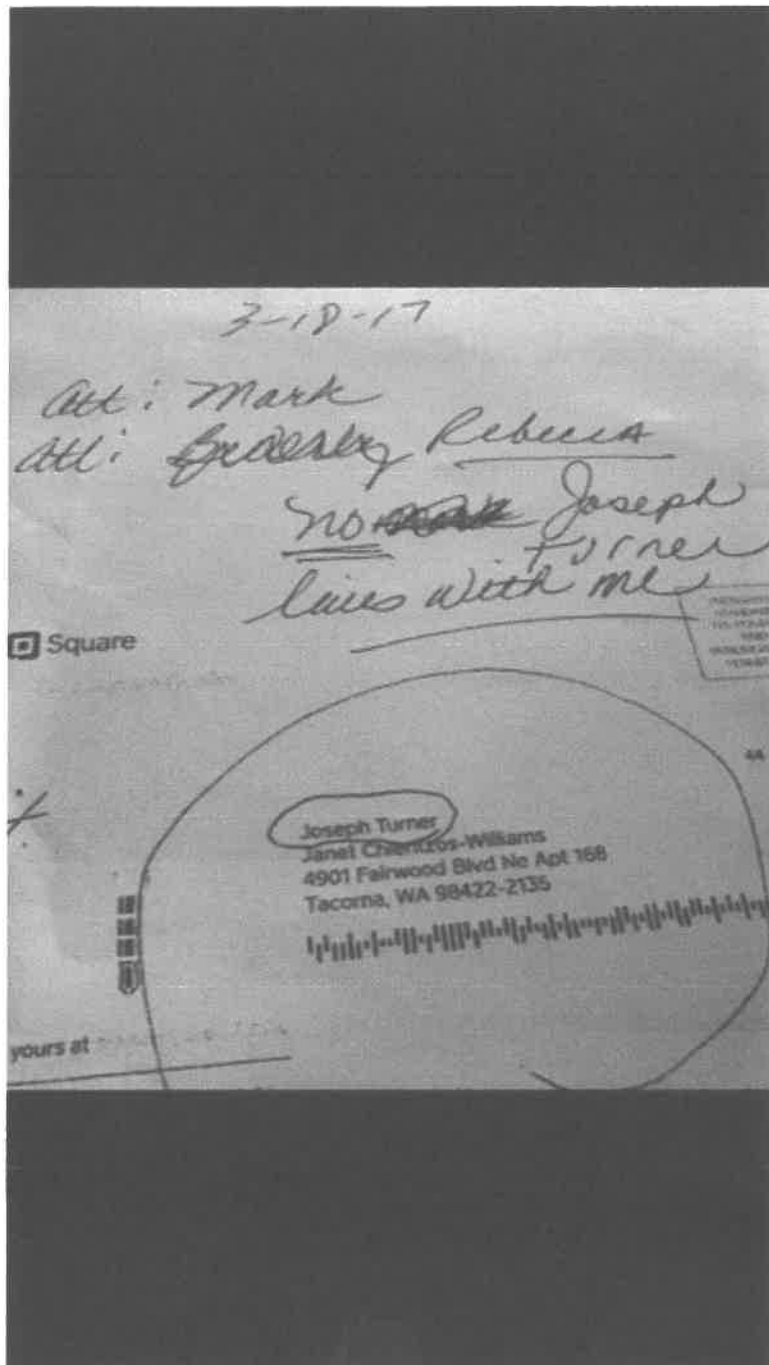
MasterCard



Discover

Only use the Square logo on Square-branded items. Square, the Square logo, and the Square logo are trademarks of Square, Inc. and are used here under license from Square, Inc. All other trademarks are the property of their respective owners.

U.S. POSTAGE PAID PERMIT NO. 1



From: Square noreply@marketing.squareup.com
Subject: Please share your feedback with Square
Date: Mar 12, 2017 at 6:04:13 AM
To: Jnt251@cs.com



Thank you for your interest in Square. We noticed you started signing up for Square but haven't finished.

At Square, we're always trying to improve our products and services. Please take a minute to give us some quick feedback so we can serve you better in the future.

[TAKE 60-SECOND SURVEY](#)

We appreciate your honest feedback and suggestions. Need help getting started? Check out our [Support Center](#).



© 2017 SQUARE, INC.
1455 MARKET STREET, SUITE 600, SAN FRANCISCO, CA 94103

[UNSUBSCRIBE OR MANAGE YOUR PREFERENCES](#)

From: Square <square@help-messaging.squareup.com>

Date: March 2, 2017 at 8:38:51 AM PST

To: "jnt251@cs.com" <jnt251@cs.com>

Subject: Re: Privacy question on mail addressed to: Joseph Turner/Janet Chlentzos- Williams

Thanks a lot for sending us a message. A team member will reply to you as soon as possible.

In the meantime, feel free to post your question in the Square Community, where you can get help from other sellers, or return to the Square Support Center for frequently asked questions. If you find your answer, we'd love for you to let us know by replying to this email.

Thanks again,

Square Support

For your reference this is Case #: 19650226

Subject: Privacy question on mail addressed to: Joseph Turner/Janet Chlentzos- Williams

Questions or Feedback: Square Inc.

1455 Market St. Suite 600

San Francisco, CA 94103 USA

P# 1-855-700-6000

1 screenshot photo of square up card I posted on Facebook January 31, 2017

I received this card in the mail and after you read my screenshot photo post, I would like an explanation immediately why it was addressed to Joseph Turner since I along with my cat Athena, have been the only tenants here since August 2015.

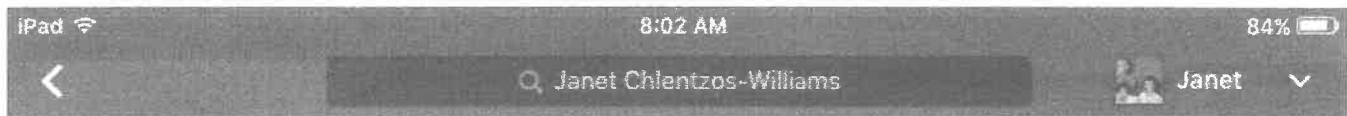
Please keep in mind that Square will be able to use and share any idea you submit without any obligations or restrictions. For more details, please visit [Square Legal Agreements, Notices, Licenses, and Policies](#).

From: Janet Chlentos-Williams jch1231@cs.com
Subject: Privacy question on mail addressed to: Joseph Turner/Janet Chlentos- Williams
Date: Mar 2, 2017 at 8:38:28 AM
To: privacy@squareup.com, Shawna Martin shawnam21@gmail.com, bdwilliams99@hotmail.com, jrfairley@gmail.com

Square Inc.
1455 Market St. Suite 600
San Francisco, CA 94103 USA
P# 1-855-700-6000

1 screenshot photo of square up card I posted on Facebook January 31, 2017

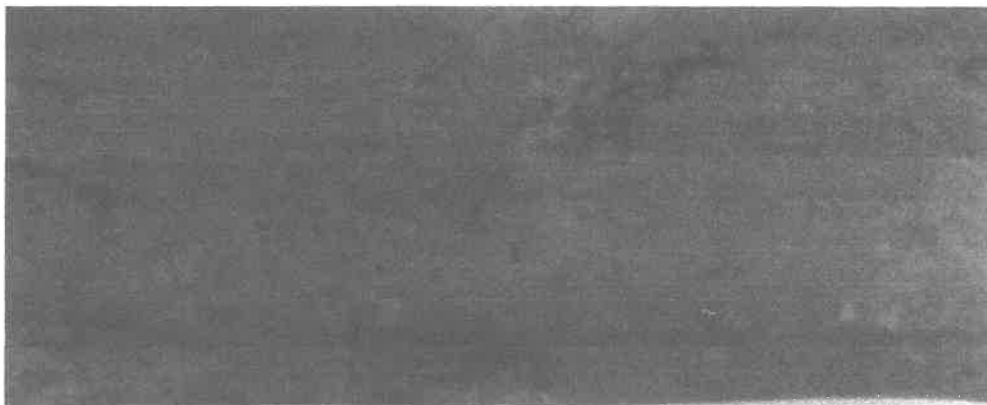
I received this card in the mail and after you read my screenshot photo post, I would like an explanation immediately why it was addressed to Joseph Turner since I along with my cat Athena, have been the only tenants here since August 2015.

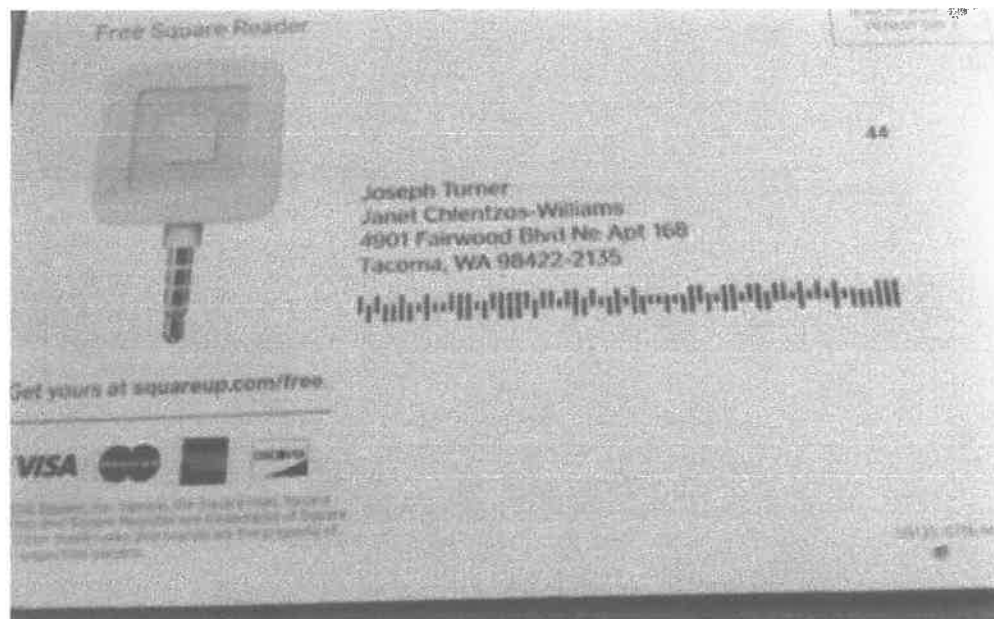


Janet Chlentos-Williams is feeling concerned with Beatrice Grow and Shawna Williams Martin at The Fairways Tacoma.

January 31 · Facebook

First of all, I don't know a Joseph Turner and told my family when I received this about 6 mo ago. Is this a scare tactic hack thru the mail? Does it have anything to do with my dad's (Angelo Chlentos) court case - Attorney Elizabeth Turner- Smith or my mom's (Melba Jean Belarde's) court case- Dr. Turner? My family along with their friends suggested I move in here August 2015 and signed my 2nd lease before I received this. I was born in Seattle at Virginia Mason Hospital and have lived here my entire life and still receiving disturbing mail!





Please respond to my email immediately,
Janet Chlentos-Williams
4901 Fairwood Blvd, N.E. Apt 168
Tacoma, WA 98422
206-795-9026 Cell

Sent from my iPad

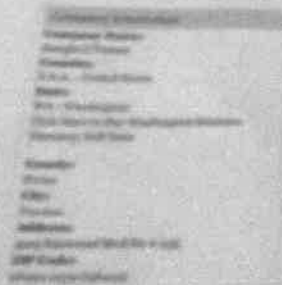
Sent from my iPad

7 shares



Sheryl Curtis

I googled the name and street name together. Might just be a Apt # mix up



1y Like Reply



Beatrice Grow

Wow, sounds like that is what is wrong..

1y Like Reply

5

Square Support

For your reference this is Case #: 19650226
Subject: Privacy question on mail addressed to: Joseph Turner/
Anet Chlentos- Williams
Questions or Feedback: Square Inc.
155 Market St. Suite 600
San Francisco, CA 94103 USA
1-855-700-6000

screenshot photo of square up card I posted on Facebook
January 31, 2017

I received this card in the mail and after you read my screenshot
photo post, I would like an explanation immediately why it was
addressed to Joseph Turner since I along with my cat Athena,
have been the only tenants here since August 2015.

Please keep in mind that Square will be able to use and share any
data you submit without any obligations or restrictions. For more
details, please visit [Square Legal Agreements, Notices, Licenses,
and Policies](#).

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JANET CHLENTZOS-WILLIAMS
4901 FAIRWOOD BLVD N8 APT 168
TACOMA, WA. 98422

U. S. District Court
CLERKS OFFICE
1717 PACIFIC AVENUE ROOM 3100
TACOMA, WA 98402

FILED	LODGED
RECEIVED	
JAN 25 2021	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA DEPUTY	

FIRST-CLASS



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